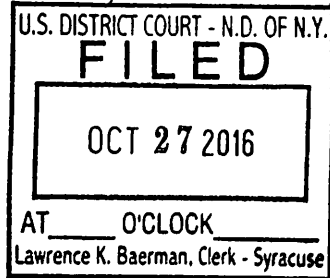


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

**STACEY J. LAPORTE, JR., and
MACKENZIE L. BAILEY,**



Defendants.

) Criminal No. 5:16-CR-320(DNH)

) **Indictment**

) Violations: 18 U.S.C. § 2251(a) and (e)
[Conspiracy to Sexually
Exploit a Child]

18 U.S.C. § 2251(a)
[Sexual Exploitation of
Children]

) 4 Counts & Forfeiture Allegation

) County of Offense: St. Lawrence

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Sexually Exploit a Child]

From in or about 2014 through in or about May, 2016, in St. Lawrence County in the Northern District of New York, defendants **STACEY J. LAPORTE, JR. and MACKENZIE L. BAILEY** conspired to use V-1, a minor female child born in 2014 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18 United States Code, Sections 2251(a) & (e).

COUNTS 2 - 3
[Sexual Exploitation of a Child]

On or about the dates listed below, in St. Lawrence County, in the Northern District of New York, defendants **STACEY J. LAPORTE, JR. and MACKENZIE L. BAILEY** did use V-1, a minor female child born in 2014 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18, United States Code, Sections 2251(a) & (e), and 2(a).

Count	Date
2	March 2, 2016
3	March 3, 2016

COUNT 4
[Sexual Exploitation of Children]

On or about February 28, 2016, in St. Lawrence County, in the Northern District of New York, defendant **STACEY J. LAPORTE, JR.** did use, persuade, induce, entice, and coerce V-2, a male child born in 2003, and V-3, a female child born in 1999, whose identities are known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) & (e).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 4 of this Indictment are hereby realleged and incorporated by reference herein for the purposes of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the charges alleged in Counts 1 through 4, the defendants, **STACEY J. LAPORTE, JR. and MACKENZIE BAILEY**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251 and 2252A (incorporating the definition of child pornography in 18 U.S.C. §2256(8)), or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense, and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to:

- a. one Lenovo T61 laptop computer (S/N: L3-MF987 08/09);
- b. one Samsung Galaxy S4 Cell Phone (S/N: R31DB22PATH);
- c. one Apple iPhone 4s (S/N: C8PLFJFVFM13); and
- d. one LG Cell Phone (S/N: 503CYWC0079417).

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party,
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853 (p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

Dated: October 27, 2016

A TRUE BILL,

*Name Redacted



Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:



Lisa M. Fletcher
Assistant United States Attorney
Bar Roll No. 510186